

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARTOR KIKI BROWN	:	
	:	
	Plaintiff,	:
	:	
	v.	Civil Action
	:	No. 17-1138
	:	
CO RENDLEMAN, et al.,	:	
	Defendants.	:

ORDER

AND NOW, this _____ day of _____, 2022, it is hereby ORDERED that Counsel for Defendants C/O Rendleman, Sgt. Muholand, and Major Abello shall be permitted to depose Plaintiff Gartor Kiki Brown, an incarcerated person, at a time, date, and manner convenient to the parties and the administration at SCI Forest, including by means of video conference.

BY THE COURT:

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARTOR KIKI BROWN	:	
	:	
	Plaintiff,	
	:	
	:	Civil Action
v.	:	No. 17-1138
	:	
CO RENDLEMAN, et al.,	:	
	Defendants.	:

DEFENDANTS' MOTION TO DEPOSE AN INCARCERATED INDIVIDUAL

Defendants C/O Rendleman, Sgt. Muholand, and Major Abello, by and through their undersigned counsel, hereby file the enclosed Motion to Compel the Deposition of an Incarcerated Individual, pursuant to Federal Rule of Civil Procedure 30(a)(2).

Respectfully submitted,

Dated: April 1, 2022

/s/ *Katelyn Mays*

Katelyn Mays
Assistant City Solicitor
Attorney Identification No. 324246
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5434
(215) 683-5397 (fax)
Katelyn.mays@phila.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARTOR KIKI BROWN	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action
	:	No. 17-1138
CO RENDLEMAN, et al.,	:	
	:	
Defendants.	:	

DEFENDANTS' MOTION TO DEPOSE AN INCARCERATED INDIVIDUAL

1. Plaintiff Gartor Kiki Brown has filed a civil action against Defendants C/O Rendleman, Sgt. Muholand, and Major Abello alleging violations of his federal civil rights.
2. According to Plaintiff, he is currently incarcerated at SCI Forest State Penitentiary in Pennsylvania.
3. Federal Rule of Civil Procedure 30(a)(2) requires an Order to depose an incarcerated individual.
4. Defendants respectfully request that this Honorable Court issue the proposed order allowing the deposition of Plaintiff, including by means of video conference.

WHEREFORE, Defendant ask that this Court enter an Order in the form proposed.

Respectfully submitted,

Dated: April 1, 2022

/s/ Katelyn Mays
Katelyn Mays
Assistant City Solicitor
Attorney Identification No. 324246
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5434
(215) 683-5397 (fax)
Katelyn.mays@phila.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARTOR KIKI BROWN	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action
	:	No. 17-1138
	:	
CO RENDLEMAN, et al.,	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of the within Motion to Depose an Incarcerated Individual will be made on the following by USPS regular mail:

Smart Communications/PA DOC
Gartor Brown, NA-6401
SCI Forest
P.O. Box 33028
St. Petersburg, FL 33733

Dated: April 1, 2022

/s/ *Katelyn Mays*

Katelyn Mays
Assistant City Solicitor
Attorney Identification No. 324246
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5434
(215) 683-5397 (fax)
Katelyn.mays@phila.gov